

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JUAN LOPEZ, *on behalf of himself, FLSA Collective
Plaintiffs and the Class,*

Plaintiff,

v.

THERMO TECH MECHANICAL, INC.,
GOWKARRAN BUDHU, and SHANTI BUDHU,

Defendants.

Case No.: 20-cv-09113 (LTS)(BCM)

**DECLARATION OF C.K. LEE, ESQ. IN SUPPORT OF
PLAINTIFF’S MOTION FOR PARTIAL SUMMARY JUDGMENT
PURSUANT TO FED. R. CIV. P. 56**

I, C. K. Lee, under penalty of perjury, affirm as follows:

1. My name is C.K. Lee, and I am a member of Lee Litigation Group, PLLC. I represent the interests of Plaintiff in the above-captioned matter.

2. I submit this Declaration in support of Plaintiff’s Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56.

3. Attached to Plaintiff’s Statement of Material Facts pursuant to Rule 56.1 as **Exhibit 1** is a copy of Defendants’ Answer to Plaintiff’s Second Amended Class and Collective Action Complaint.

4. Attached to Plaintiff’s Statement of Material Facts pursuant to Rule 56.1 as **Exhibit 2** to Plaintiff’s Statement of Material Facts pursuant to Rule 56.1 is a true and correct copy of Defendants’ production of Plaintiff’s 2017 Wage and Hour Records.

5. Attached to Plaintiff’s Statement of Material Facts pursuant to Rule 56.1 as **Exhibit 3** is a true and correct copy of Defendants’ production of Plaintiff’s 2018 Wage and Hour Records.

6. Attached to Plaintiff's Statement of Material Facts pursuant to Rule 56.1 as **Exhibit 4** is a true and correct copy of the deposition transcript of Individual Defendant GOWKARRAN BUDHU.

7. Attached to Plaintiff's Statement of Material Facts pursuant to Rule 56.1 as **Exhibit 5** is a true and correct copy of Defendants' Employee Manual produced by Defendants.

8. Attached to Plaintiff's Statement of Material Facts pursuant to Rule 56.1 as **Exhibit 6** is a true and correct copy of Plaintiff's Second Amended Complaint.

I affirm, under penalty of perjury, that the above and foregoing information is true and correct.

Date: July 12, 2024
New York, New York

Respectfully submitted,

LEE LITIGATION GROUP, PLLC

By: /s/ CK Lee

C.K. Lee, Esq.

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